

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Steven Mendoza,)	
)	
Plaintiff,)	No. 20-cv-670
)	
-vs-)	Judge Bucklo
)	
Thomas Dart and Cook County,)	
)	
)	
Defendants.)	

**DEFENDANT COOK COUNTY’S SECOND AMENDED RESPONSE TO
PLAINTIFF’S SET OF INTERROGATORIES**

NOW COMES Defendant, COOK COUNTY (“Cook County”), by its attorney KIMBERLY M. FOXX, State’s Attorney of Cook County, through her Assistant State’s Attorney, Miguel E. Larios, and for its Second Amended Response to Plaintiff’s First Set of Interrogatories, states as follows:

INTERROGATORIES

1. Identify, by name and position, the individual who answered each interrogatory.

RESPONSE: Counsel for Cook County in consultation with Eric Davis from Capital Planning.

2. In response to a grievance about Branch 38 (the grievance assigned control number 201913528) Sabrina Rivero-Canchola wrote “Capital Planning has been advised of your concerns regarding Branch 38.” *See* CCSAO Mendoza 000019. Describe the response by Capital Planning, if any, to plaintiff’s concerns about accessibility at Branch 38.

RESPONSE: Cook County is not aware of any correspondence between Capital Planning and Plaintiff.

3. Does the Branch 38 courthouse have ADA accessible bathrooms for the general public?

RESPONSE: Upon information and belief, the bathrooms at Branch 38 were compliant with the applicable accessibility code requirements at the time the building was built, but are not currently fully compliant with the ADA, IAC, CBC, or other applicable accessibility code provisions.

4. Does the Branch 38 courthouse have ADA accessible bathrooms for the staff?

RESPONSE: Upon information and belief, the bathrooms at Branch 38 were compliant with the applicable accessibility code requirements at the time the building was built, but are not currently fully compliant with the ADA, IAC, CBC, or other applicable accessibility code provisions.

5. Explain why there are no ADA compliant bathrooms in the holding cells at the Branch 38 courthouse.

RESPONSE: Cook County objects to Interrogatory No. 5 as argumentative, speculative, and assuming facts that are not in evidence.

6. In a deposition on December 19, 2019, Eric Davis, the Deputy Director of Capital Planning and Policy, testified that he expected the Leighton ramps to be renovated in fiscal year 2020. Explain the present status of Cook County's efforts to renovate the Leighton ramps.

RESPONSE: Cook County objects to Interrogatory No. 6 as mischaracterizing previous testimony, and assuming facts not in evidence. Subject to and without waving said objection, the Leighton ramps were completed in May 2021.

7. The Leighton Courthouse has public ADA complaint bathrooms for the public. Identify the date when Cook County renovated the courthouse to provide ADA public bathrooms for the general public.

RESPONSE: Cook County objects to Interrogatory No. 7 as irrelevant, argumentative, assuming facts not in evidence, and not related to any claim or defense asserted. Subject to and without waving said objection, a renovation project was completed in 2006, which included bringing those renovated public bathrooms up to the applicable code at the time.

8. Does the Leighton Courthouse presently have ADA complaint toilets and sinks for the staff?

RESPONSE: Cook County objects to Interrogatory No. 8 as irrelevant and not related to any claim or defense asserted. Subject to and without waving said objection, certain staff bathrooms at the Leighton Courthouse may have ADA compliant toilets and sinks for the staff.

Dated: October 8, 2021

Respectfully Submitted:


KIMBERLY M. FOXX

State's Attorney of Cook County

By: /s/ Miguel E. Larios
Miguel E. Larios
Assistant State's Attorney
Conflicts Counsel Unit
50 West Washington Street, Suite 2760
Chicago, Illinois 60602
(312) 603-1427
miguel.larios@cookcountyil.gov

VERIFICATION

I, Eric Davis, do hereby certify that pursuant to Rule 33(b) that my Answers to the foregoing Interrogatories are true and complete to the best of my knowledge.

Signed: _____

Dated: October 8, 2021

Eric Davis
Deputy Director, Bureau of Asset Management
Department of Capital Planning and Policy
For Cook County

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served **Cook County's Second Amended Response to Plaintiff's First Set of Interrogatories** via email to all attorneys of record on October 12, 2021.

/s/ Miguel E. Larios
Miguel E. Larios